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15 Attorneys for Plaintiff
16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

20 No. 2:25-MJ-3547-DUTY

21 Plaintiff,

22 STIPULATION RE FILING OF
INFORMATION OR INDICTMENT
PURSUANT TO SPEEDY TRIAL ACT

v.

23 ALBERTO SANDOVAL-ALVARADO,

24 Defendant.

25 Plaintiff United States of America, by and through its counsel
26 of record, the United States Attorney for the Central District of
27 California and Assistant United States Attorney John D. Ellis, and
28 defendant Alberto Sandoval-Alvarado ("defendant"), by and through his
counsel of record, Andy A. Miri, hereby stipulate as follows.

29 1. Defendant was arrested for a violation of 8 U.S.C.
30 § 1324(a)(1)(A)(iii) on June 8, 2025, and made his initial appearance
31 in this Court on June 11, 2025. The Court ordered defendant released
32 on an appearance bond and set a post-indictment arraignment for July
33 10, 2025.

1 2. Defendant waived his right to a preliminary hearing at the
2 initial appearance (ECF 7).

3 3. The Speedy Trial Act of 1974, 18 U.S.C. § 3161(b),
4 originally required an information or indictment to be filed within
5 30 days of defendant's arrest, that is, on or before July 8, 2025.

6 4. By this stipulation, defendant hereby waives his rights
7 under 18 U.S.C. § 3161(b) and moves to continue the date by which an
8 information or indictment must be filed from July 8, 2025, to
9 September 8, 2025, and further for a continuance of the post-
10 indictment arraignment from July 10, 2025, to September 10, 2025.

11 5. The parties further agree and stipulate, and request that
12 the Court find the following:

13 a. The ends of justice outweigh the interest of the
14 public and defendant in the filing of an information or indictment
15 within the original date prescribed by the Speedy Trial Act because:

16 i. The parties have discussed and continue to discuss a
17 pretrial, pre-indictment resolution to this case;

18 ii. Defendant and his counsel require additional time to
19 consider a plea offer prior to or concurrent with the filing of an
20 information or indictment in this case; and

21 iii. Defendant and his counsel require additional time for
22 defense counsel to conduct and complete an independent investigation
23 of the case, advise defendant, and prepare for trial if a pretrial,
24 pre-indictment resolution does not occur.

25 6. Based on the foregoing, the parties request that the Court
26 find that for the purpose of computing the time under the Speedy
27 Trial Act within which an information or indictment must be filed,
28 the time period of July 8, 2025, to September 8, 2025, inclusive, is

deemed excludable pursuant to 18 U.S.C. § 3161(h) because the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a filing of an information or indictment within the period specified in 18 U.S.C. § 3161(b).

7. The parties agree, stipulate, and request that the Court find that nothing in this stipulation and proposed order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which an information or indictment must be filed.

IT IS SO STIPULATED.

Dated: June 26, 2025

BILAL A. ESSAYLI
United States Attorney

CHRISTINA T. SHAY
Assistant United States Attorney
Chief, Criminal Division

/s/ John D. Ellis
JOHN D. ELLIS
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: June 26, 2025

/s/ Andy A. Miri
ANDY A. MIRI*
Attorney for Defendant
ALBERTO SANDOVAL-ALVARADO

* Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

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